

**BASS, BERRY & SIMS PLC**

A PROFESSIONAL LIMITED LIABILITY COMPANY  
ATTORNEYS AT LAW

T. G. PAPPAS  
TEL: (615) 742-6242  
FAX: (615) 742-6293

2700 FIRST AMERICAN CENTER  
NASHVILLE, TENNESSEE 37238-2700  
(615) 742-6200

REC'D TN  
REGULATORY AUTH

KNOXVILLE OFFICE:  
1700 RIVERVIEW TOWER  
KNOXVILLE, TN 37901-1509  
(423) 521-6200

'99 MAY 17 PM 3 26

May 17, 1999

OFFICE OF THE  
EXECUTIVE SECRETARY

Mr. K. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

99-00297

**IN RE: Twin Lakes Telephone Cooperative Corporation**  
**IntraLATA Dialing Parity Implementation Plan**

Dear Mr. Waddell:

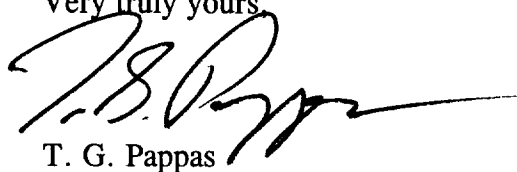
The TRA staff has requested certain additional information from our client Twin Lakes Telephone Cooperative Corporation in connection with a review that the staff is conducting of our client's IntraLATA Toll Dialing Parity Implementation Plan (the "Plan") dated April 21, 1999.

Enclosed please find an original and thirteen copies of:

1. Addendum to the Plan dated May 14, 1999.
2. Revised Exhibit B to the Plan, also revised as of May 14, 1999, to be substituted for Exhibit B to the Plan filed April 22, 1999.

With kindest regards, I remain

Very truly yours,



T. G. Pappas

TGP/br#2022890

Enclosures

cc: Mr. Carsie Mundy  
Richard Collier, Esq.  
Robert D. Dudney  
Thomas J. Moorman, Esq.

**Addendum to April 22, 1999**  
**IntraLATA Toll Dialing Parity Implementation Plan**  
**Twin Lakes Telephone Cooperative Corporation**

**1. List of Exchanges**

As indicated in the Company's IntraLATA Toll Dialing Parity Implementation Plan, (the "Plan"), the Company will provide intraLATA toll dialing parity in all of its Tennessee exchanges. Except for Chestnut Mound, which is located in the "615" area code, the Company's exchanges are located in the "931" area code. The Company's exchanges are:

<u>Exchange</u>	<u>NXX</u>	<u>Exchange</u>	<u>NXX</u>
Baxter	858	Granville	653
Byrdstown	864	Highland	678
Celina	243	Jamestown	879, 752
Chestnut Mound	897	Livingston	823, 397, 403
Clarkrange	863	Moss	258
Cookeville South	432	North Springs	621
Crawford	445	Rickman	498
Gainesboro	268, 405		

**2. Customer Education/Notification**

Consistent with its proposed implementation date of September 1, 1999 for the provision of intraLATA toll dialing parity, all existing customers will be provided notice of this new service option via newsletter on or about July 1, 1999. In addition, the Company will provide a bill message to existing customers addressing this new service option on or about August 1, 1999. After implementation, all new customers will be advised of this service and requested to make an intraLATA carrier selection at the time of application for services.

**3. Compliance with the Tennessee Regulatory Authority Anti-Slamming Rules**

The Company shall comply with rules established by the Tennessee Regulatory Authority ("TRA") with respect to changes in a customer's preferred carrier as contained in TRA Rule 1220-4-2-.56 "Verification of Orders for Changes by Local and Long Distance Telecommunications Carriers." In addition, the Company will institute policies and practices consistent with the obligations set forth in TRA Rules 1220-4-2-.56 which requires other Local Exchange Carriers to file tariffs regarding preferred carrier freezes.

4. **Establishment of Cost Recovery Rate Element**

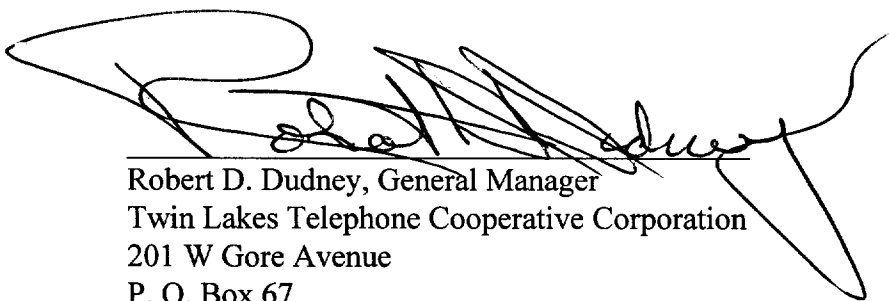
The Company provides an amended Exhibit B to reflect a revised calculation of the Company's initial equal access rate element. This revision is due to an inadvertent use of total intrastate/intraLATA minutes rather than limiting the calculation only to originating intrastate intraLATA minutes of use as reflected in the Plan itself.

5. **Clarification of County-Wide Calling**

The Company clarifies Section II of its Plan with respect to its reference to the continuation of county-wide calling after the implementation of the Plan. Accordingly, the Company amends the last sentence of Section II to state:

"Twin Lakes will continue to process toll-free intraLATA county-wide calls in this manner for toll customers after implementation of intraLATA toll dialing."

Executed this 14<sup>TH</sup> day of May, 1999



Robert D. Dudney, General Manager  
Twin Lakes Telephone Cooperative Corporation  
201 W Gore Avenue  
P. O. Box 67  
Gainesboro, TN 38562  
Phone: (931) 268-2151

TENNESSEE  
METHODOLOGY FOR RECOVERY OF COSTS  
ASSOCIATED WITH  
IMPLEMENTATION OF INTRALATA SUBSCRIPTION

CALCULATION OF INITIAL EQUAL ACCESS RATE ELEMENT

Step 1: Identify the estimated total incremental costs directly attributable to the provisioning of IntraLATA Subscription. Incremental costs include the following items:

- a) network hardware upgrades to provide the full 2-PIC methodology in all exchanges
- b) central office software upgrades
- c) software translations
- d) system programming/testing
- e) training for Business Office, Marketing, Carrier Services, Customer Services, and Service Center personnel
- f) customer notification (bill message, newsletter and special mailing)
- g) implementation activity - administrative costs
- h) PIC change charge waiver

\$ 69,540.00

Step 2: Identify estimated total originating Intrastate/IntraLATA minutes of use for the 4 year recovery period.

96,414,288

Step 3: Calculate a cost recovery rate by dividing amount in Step 1 by the Minutes of Use in Step 2.

\$ 0.000721

ANNUAL TRUE-UP OF EQUAL ACCESS RATE ELEMENT

Repeat Steps 1 through 3 and calculate an updated access rate element by dividing amount in Step 1, adjusted by the previous year/years cost recovery.

(Revised May 14, 1999)